

Internal Correspondence

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MARTIN MARIETTA

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MARTIN MARIETTA ENERGY SYSTEMS, INC.

August 30, 1990

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**Occurrence Reporting for Environmental Restoration Division**

The Environmental Restoration (ER) Division has personnel physically located and working at all plant sites and in some off-site plant areas. The central ER Division organization is physically located at K-25 and reports through the Vice President, Technical Operations. ER also reports to the Department of Energy (DOE) ER Program Manager versus the individual plant DOE Contracting Officer's Representative (COR). To effectively comply with DOE Order 5000.3a and ensure all appropriate Martin Marietta Energy Systems, Inc., and DOE Facility Managers are informed, we plan to implement a dual reporting system as indicated below.

Facility occurrences (i.e., those involving safety, health, operational, or environmental considerations, buildings, or other physical facilities) will be reported through ER Division management to the DOE ER Program Manager and through Energy Systems' Plant Managers to the DOE Plant Managers simultaneously.

Programmatic occurrences (i.e., those involving program deadlines, schedules, reporting requirements, operational plans, etc.) will be reported only through ER Division management to the DOE ER Program Manager.

The Plant Shift Superintendent (PSS) for the reporting plant will be requested to assist in reporting of the occurrence following individual plant standards. Facility occurrences will be reported through the PSS for that plant where the occurrence took place. Programmatic occurrences, regardless of the location, will be reported using the services of the K-25 PSS.

The ER Division Facility Manager and the Plant Facility Managers will both sign occurrence reports that involve ER Division facilities and/or personnel located at individual plant sites. The report will be forwarded to both the Plant Manager and the DOE ER Program Manager for signature. Programmatic occurrences will not be sent to the K-25 Plant Facility Manager or the individual DOE Plant Managers for signature.

The ER Division Facility Manager should be notified for all occurrences that involve ER Division personnel, facilities, or processes that are reported directly to the PSS. An interim procedure for the ER Division occurrence reporting is attached which should be used to contact the appropriate personnel.

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The initiating line manager, regardless of the organization, will be responsible for completion of the Occurrence Reporting System (ORS) report form including identification and implementation of corrective actions unless specifically instructed otherwise.

If you have any questions, please contact either myself or Bill Thompson (6-2602 or FTS 626-2602).



L. D. Bates, K-1210, MS-7256 (4-8995)

LDB:msc(occur.rpt)

Attachment

cc/att: D. R. Allen, DOE-PAD  
K. W. Cook  
L. M. Cuddy  
R. G. Donnelly, PORTS  
G. G. Fee  
E. W. Gillespie, DOE-PEO  
J. L. Haymore  
M. M. Heiskel, DOE-ORO  
B. L. Kimmel  
M. L. Jones  
J. C. Massey, PAD  
L. E. May  
J. A. Reafsnyder, DOE-ORO  
M. W. Rosenthal  
R. C. Sleeman, DOE-ORO  
R. H. Snyder, PORTS  
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D. W. Swindle  
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File—ER Document Management Center—RC

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## I. PURPOSE

This procedure describes occurrence reporting requirements for the Environmental Restoration (ER) Division. It supplements Martin Marietta Energy Systems, Inc., General Policy GP-13, Standards GS-13.1 and GS-13.2, and the plant standard practice procedures.

## II. REFERENCES

- A. U.S. Department of Energy, DOE 5000.3A, "Occurrence Reporting and Processing of Operations Information," May 30, 1990.
- B. Martin Marietta Energy Systems General Policy, GP-13, "Occurrence Reporting System (ORS)."
- C. Martin Marietta Energy Systems Standard, GS-13.1, "Occurrence Reporting Method."
- D. Martin Marietta Energy Systems Standard, GS-13.2, "Analysis and Corrective Actions for Reported Occurrences."
- E. K-25 Standard Practice Procedure, SPP 504, "Occurrence Reporting System."
- F. Y-12 Standard Practice Procedure, "Occurrence Reporting System."
- G. ORNL Standard Practice Procedure, "Occurrence Reporting System."
- H. Paducah Standard Practice Procedure, "Occurrence Reporting System."
- I. Portsmouth Standard Practice Procedure, "Occurrence Reporting System."
- J. Martin Marietta Energy Systems Procedure, QP-16.1.1, "Energy Systems Action Management System Input."
- K. Martin Marietta Energy Systems Procedure, QP-16.2.1 "Corrective Action Reporting, Tracking and Trending System."

## III. REQUIRED RECORDS

The plant shift superintendent's (PSS's) or laboratory shift superintendent's (LSS's) office will retain a copy of the Occurrence Reporting System report and supporting documentation. Copies of the report and supporting documentation should be sent to

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all ER Division supervisors and the ER Document Management Center. Energy Systems Action Management System Input (QP-16.1.1) and Corrective Action Reporting, Tracking and Trending System (QP-16.2.1) will be used to track the reports and corrective actions.

#### IV. SCOPE/LIMITATIONS

This ER Division procedure is applicable to the ER Division central office; the Off-Site, ORNL, K-25, Portsmouth, Paducah, and Y-12 site program offices; subcontractors; and other personnel working in direct support of ER Program activities.

#### V. DEFINITIONS

*Facility Manager (or designee):* The ER Division Director is the Facility Manager for reporting of occurrences. Program directors or others specifically designated will serve as Facility Manager in the absence of the Division Director.

*Facility occurrence:* Occurrences involving safety, health, operational, or environmental considerations, buildings, or other physical facilities.

*Line management:* Responsible management, which can be the Facility Manager or designee, immediate supervisor, program manager, program director, etc., who has responsibility for the area and/or activity where the event occurred.

*Occurrence:* Reportable problems, concerns, and adverse conditions or events that have or could have adverse or negative impact on safety, environment, health, quality, security, or operations.

*Occurrence Reporting System (ORS):* A written description and evaluation of an occurrence as described in Department of Energy (DOE) Order 5000.3A.

*Occurrence Reporting System Report Form:* The report form described in Energy Systems Standard GS-13.2.

*Programmatic occurrence:* Occurrence involving program deadlines, schedules, reporting requirements, operational plans, etc.

#### VI. GENERAL INFORMATION

This procedure should be used in conjunction with Martin Marietta Energy Systems General Policy GP-13, "Occurrence Reporting System," and General Standards GS-13.1 "Occurrence Reporting Method," and GS-13.2 "Analysis and Corrective Actions for

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Reported Occurrences." The appropriate site standard practice procedure (SPP) must also be followed. The SPP is strictly additive to the requirements of General Standards GS-13.1 and 13.2 and does not eliminate or change any requirements in them. Additional reporting requirements identified here should be conducted parallel with those required in the general standards. Copies of documentation developed by these general standards should be maintained to meet the requirements of this procedure.

## VII. REQUIREMENTS

The ER Division is a central organization reporting through the Vice President, Technical Operations, to the DOE ER Division Program Manager. However, most ER Division activities are conducted at a plant or laboratory site that reports through plant management to Site DOE managers. To ensure that all affected Energy Systems and DOE managers are informed, facility occurrences (i.e., those involving safety, health, operational, or environmental considerations, buildings, or other physical facilities) must be reported through the ER Division and plant management systems to both plant DOE managers and facility representatives and the DOE ER Division manager and facility representative. Similar events that meet the definition of a physical occurrence but occur outside the physical plant boundaries and are under the responsibility of an ER site program manager shall be reported as a facility occurrence through the PSS/LSS where the ER site program manager is located. Occurrences involving only programmatic problems shall be reported through the ER Division management system to the DOE ER Division manager but *not* to the plant manager or plant DOE managers.

The appropriate PSS/LSS will facilitate the reporting process. The PSS or LSS will assist in categorization, obtain occurrence report numbers, establish the phone bridge, and submit the initial 24-h occurrence report. The K-25 PSS will make all programmatic occurrence reports.

The Facility Manager or his designee shall be on call 24 h per day, 7 days per week. A pager specifically for maintaining communications has been dedicated for occurrence reporting. Lanny D. Bates is the ER Division Facility Manager. His pager number is 564-3683, his office phone number is 4-8995, and his home phone number is 376-2768.

## VIII. RESPONSIBILITIES

- A. *Facility Manager (or designee)*: The Facility Manager will be on call 24 h per day, 7 days per week. He will wear a pager that is assigned specifically for meeting the notification requirements. When notified of an occurrence, the Facility Manager:

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1. Concurs with the categorization of the reportable occurrence. The occurrence must be categorized as soon as possible (ASAP) but within 2 h from identification.
  2. Participates in the conference call to the DOE Facility Representative and the DOE Program Manager. The conference call must be made ASAP but within 2 h of categorization for Category II and within 15 min for Category I.
  3. Ensures that all requirements of General Policy GP-13 and General Standards GS-13.1 and GS-13.1 are met.
  4. Ensures that the ORS Notification Report (Items 1 through 14 of the ORS Report Form) is sent to DOE within 24 h of categorization.
  5. Reviews the ORS Report (items 1 through 24), submits it to DOE within 10 days of categorization, and distributes it to ER Division supervision.
  6. Approves the final ORS Report and submits it to DOE for signature.
  7. Distributes the signed final ORS Report to DOE and ER Division supervision.
- B. *Individual employees (includes contract/subcontract personnel):* Take necessary emergency actions to mitigate the emergency, notify the PSS/LSS, and advise line management of the event per General Policy GP-13.
- C. *Line manager:* When notified or made aware of a suspected or potential occurrence, the line manager is responsible for ensuring that necessary actions are taken to mitigate the emergency and to take the following action:
1. Determine, ASAP, but within 2 h of identification, if the event meets the definition of an occurrence.
  2. Use Attachment 5 of General Standard GS-13.1 to make a preliminary categorization of the occurrence and immediately notify the appropriate PSS/LSS.
  3. Assist the PSS/LSS in communicating details of the occurrence and immediate corrective actions to the Facility Manager. The occurrence must be verbally reported to DOE ASAP but within 2 h for Category II and 15 min for Category I.

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4. Immediately communicate details of the occurrence to the appropriate ER Division site program manager, the appropriate ER Division program director, and the ER Division safety and health manager.
5. Assist the PSS/LSS in completing the written ORS Notification Report (items 1 through 14 of the ORS Report Form) and forward copies to the ER Division program managers, the ER Division safety and health manager, ER Division program directors, and the ER Division Director. The written ORS Notification Report must be sent through the PSS/LSS to DOE within 24 h of categorization.
6. Complete the requirements of line management as outlined in General Standard GS-13.1.
7. Assist the PSS/LSS and Facility Manager as required.
8. Update the written ORS Notification Report as required.

*(In some circumstances the Program Director may assign a line manager other than the one who handled the initial response to complete the following actions.)*

9. Complete the ORS Report (items 1 through 24) and forward it through supervision to the ER Division Facility Manager for submission to DOE within 10 working days of categorization.
10. Complete the final ORS Report when the cause has been analyzed, the root cause determined, and corrective actions determined and scheduled.
11. Forward the final ORS Report through ER Division supervision to the ER Division Facility Manager for approval.
12. Ensure that corrective actions are tracked and completed on a timely basis.

**D. Program Director**

1. Ensures that immediate corrective actions are taken.
2. Assigns a line manager to complete the initial ORS Report, to submit update reports as required, and to prepare the final ORS Report.
3. Assigns people to assist with investigations, determine the cause and corrective actions, and track corrective action completion.

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**IX. ACTION STEPS**

The occurrence reporting system may be initiated anytime an employee, contractor, or subcontractor reports a problem, concern, or event to an ER Division supervisor or the PSS or LSS (as appropriate). In some cases the PSS or LSS may be the one notifying the ER Division of an occurrence. If the event involves a real-time occurrence that requires assistance from plant emergency services, it should be communicated using standard plant procedures to the PSS's or LSS's office. The attachment shows a flow chart outlining the basic steps of the reporting process.

Reporting, both verbal and written, must meet specific time limits depending on the categorization of the occurrence. Categorization and reporting time frames are shown in the following table.

**Categorization and Reporting Time Frames**

	From identification to categorization	Maximum time		From categorization to submittal of ORS Report (items 1-24)	Final ORS Report
		Verbal	ORS Notification Report (items 1-14 of ORS Report Form)		
I. Emergency occurrence	ASAP, but within 2 h	15 min.	ASAP, but within 24 h	10 working days for initial submittal with update when new information is available.	Required when cause has been analyzed, root cause determined, and corrective actions determined and scheduled (final report shall be approved by the Facility Manager (or designee) and DOE).
II. Unusual occurrence	ASAP, but within 2 h	As soon as information is available, but within 2 h	24 h		
III. Off-normal occurrence	ASAP, but within 2 h		24 h		
IV. Nonroutine occurrence	2 h		10 working days (internal)		Issued after corrective action for those Category IV occurrences that require corrective action.



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A. *Determination of problem by any employee*

1. Notify emergency personnel and provide necessary assistance to minimize the impact of the event.
2. Decide if event is a facility occurrence or a programmatic occurrence (see Part V, Definitions).
3. Make an initial categorization of the event.
4. If the event is a facility occurrence, report Categories I, II, and III directly to the PSS/LSS and ASAP to the appropriate program manager or if unavailable the program director. Skip to step A.6 and then follow the steps in Part B below. If the event is a Category IV, proceed to Part D.1 below.
5. If the event is a programmatic occurrence, report Categories I, II, and III through ER Division supervision to the ER Division Facility Manager. If a supervisor is not available, report the event to the next higher level supervisor. Do not delay reporting if a supervisor is not available. Go on to step 6 and then follow the steps in Part C below. If the event is a Category IV, proceed to Part D.1 below.
6. If the occurrence involves off-site agencies or people and a media event is likely, the ER Division program manager should call the ER Division community relations representative. If the occurrence involves safety, health, or contamination of an employee, the program manager should notify the ER Division safety and health manager.

B. *Notification of facility occurrences*

1. The PSS/LSS will provide appropriate emergency assistance.
2. The PSS/LSS will provide assistance in the categorization effort and will contact the ER Division Facility Manager and the plant facility manager and will obtain their concurrence on the categorization.
3. If required, the PSS/LSS will establish the phone bridge with the facility managers and DOE to make the verbal notification.
4. The PSS/LSS, with the assistance of the line manager, will transmit first a facsimile copy of the ORS Notification Report followed by the official version

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of the report by mail to DOE within 24 h in accordance with General Standards GS-13.1 and GS-13.2.

*C. Notification of programmatic occurrences*

1. The ER Division program director will determine if a programmatic reportable occurrence exists. If the program director is not available, the ER Division Facility Manager will determine if a reportable occurrence exists.
2. The program director will notify the ER Division Facility Manager of the occurrence.
3. The Facility Manager will concur with the categorization and request the K-25 PSS to assist in notifying DOE.
4. The PSS will provide assistance in the categorization of the event if required.
5. If required, the PSS will establish the phone bridge with the ER Division Facility Manager and DOE to make the verbal notification.
6. The PSS with the assistance of the Facility Manager will transmit first a facsimile copy of the ORS Notification Report followed by the official version of the report by mail to DOE within 24 h in accordance with General Standards GS-13.1 and GS-13.2.

*D. Reporting of all occurrences*

1. Line management will complete the 10-day ORS Report (items 1 through 24) and forward it through ER Division supervision to the ER Division Facility Manager for submission to DOE. The report must be submitted to DOE within 10 working days. Category IV occurrences are not reported to DOE. The PSS/LSS will assist in obtaining a report number and inputting the occurrence into the ESAMS computer data base.
2. Line management will assist in any investigations and identifying corrective actions.
3. Line management will complete the ORS Final Report and forward it through ER Division supervision to the ER Division Facility Manager for review prior to issuance.

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4. The ER Division Facility Manager shall approve the ORS Final Report and send it to DOE for signature.
5. The ER Division Facility Manager shall distribute the signed report to the ER Document Management Center and ER Division supervision as appropriate.
6. Line management shall track completion of corrective actions and report progress to ER Division management.

**X. ADMINISTRATION**

The administration of this procedure, including implementation, changes, and revisions, is the immediate responsibility of the ER procedures coordinator with the full sanction of the ER Division Director.

Approved by:



L. D. Bates, Acting Director  
Environmental Restoration Division

Date: 8-30-90

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